

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Case Type: Criminal  
Court File No. 27-CR-20-12953

Plaintiff,

vs.

**SUPPLEMENTAL PROSECUTION  
DISCLOSURE PURSUANT TO  
RULE 9.01, SUBD. 1**

J. Alexander Kueng,

Defendant.

TO: The above-named defendant and defendant's attorneys, Thomas Plunkett, U.S. Bank Center, 101 East Fifth Street, Suite 1500, St. Paul, MN 55101.

Pursuant to Rule 9.01, subd. 1, Minn. R. Crim. P., attached please find the following supplemental disclosure consisting of pages 44160-44896, incorporating by reference all previous disclosures:

- Police/investigative report(s)
- Statement(s) relating to the case
- Statement(s) of the defendant and/or accomplice(s)
- Social service report(s)
- Search warrant(s)
- Laboratory report(s)
- Report(s) of medical or mental examination(s)
- Criminal history information
- Evidence receipt(s)
- Diagram(s)/documentary exhibit(s)
- Photograph(s), video tape(s), audio tape(s), and DVDs

- \_\_\_\_\_ Business/public record(s)
- \_\_\_\_\_ Spreigl material
- \_\_\_\_\_ Exculpatory material
- X   Other: Order Permitting Release of Information, Transcripts: Nicole Mackenzie, Daniel Dick, Dr. Andrew Baker, Martin J. Tobin MD brief biographical sketch, Dr. Tobin's CV

The State may, pursuant to Minn. R. Evid. 608(b) or any other rule, cross-examine defendant, if defendant testifies, about any of defendant's conduct that is disclosed as part of this, any previous, or any subsequent, disclosure.

PURSUANT TO MINN. R. CRIM. P. 9.03, SUBD. 4, DISCOVERY MATERIALS SHALL REMAIN IN THE CUSTODY OF DEFENSE COUNSEL, shall not be placed in defendant's custody, and shall be used by defense counsel only for the purpose of conducting that attorney's side of the case. Absent an order from the court issued upon written motion, failure to comply with Minn. R. Crim. P. 9.03, subd. 4, may result in sanctions pursuant to Minn. R. Crim. P. 9.03, subd. 8.

Dated: February 26, 2021

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota  
/s/ Matthew Frank  
MATTHEW FRANK  
Assistant Attorney General  
Atty. Reg. No. 021940X  
445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2131  
(651) 757-1448 (Voice)  
(651) 297-4348 (Fax)  
matthew.frank@ag.state.mn.us

ATTORNEYS FOR PLAINTIFF